

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
MICHELLE NICOLE ARCHIE	:	
fka Michelle Nicole Carelock,	:	CASE NO. 1:16-bk-02801
Debtor	:	
	:	
MICHELLE NICOLE ARCHIE	:	
fka Michelle Nicole Carelock,	:	
Movant	:	
v.	:	
DEUTSCHE BANK, NATIONAL TRUST	:	OBJECTION TO CLAIM # 10
COMPANY, as Trustee for First Franklin	:	
Mortgage Loan Trus 2006-FF11,	:	
Mortgage Pass-Through Certificates,	:	
Series 2006-FF11, as serviced by	:	
SPECIALIZED LOAN SERVICING LLC,	:	
Respondent/Claimant	:	

**OBJECTION TO NOTICE OF POSTPETITION MORTGAGE FEES, EXPENSES AND
CHARGES RE PROOF OF CLAIM #10**

COMES NOW the Debtor, by and through attorney Dorothy L. Mott, Esquire and makes this Objection to Creditor's claim filed in the above-captioned bankruptcy proceeding, stating in support there of as follows:

1. The Debtor filed a Chapter 13 bankruptcy proceeding on 7/7/2016.
2. The Respondent filed a secured claim on or about October 31, 2016 in the amount of \$54,644.01.
3. On July 10, 2018, the Respondent filed a Notice of Postpetition Mortgage Fees, Expenses and Charges.
4. The notice indicates that the charge is for hazard insurance in the amount of \$1,100.00.
5. The Debtor's mortgage payment includes escrow for taxes and insurance.

6. The charge for hazard insurance is therefore paid as a component of the Debtor's mortgage payment.

7. Because the charge amends the Respondent's original proof of claim, the Chapter 13 Trustee will add this amount to the creditor's claim to be paid through the Chapter 13 plan, when it is already being paid by the Debtor's escrow account.

8. The amendment to proof of claim for a postpetition charge for hazard insurance should be dismissed.

WHEREFORE, the Debtor hereby requests that this Honorable Court enter an order

1. Disallowing and dismissing the postpetition charge; and
- 2.. Granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
717.232.6650 Tel
717.232.0477 Fax
doriemott@aol.com

**LOCAL BANKRUPTCY FORM 3007-1
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fka Michelle Nicole Carelock,	:	OBJECTION TO CLAIM # 10
Objector(s)	:	
	:	
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SPECIALIZED LOAN SERVICING LLC,	:	
Respondent/Claimant	:	

TO:SPECIALIZED LOAN SERVICING LLC ("Claimant")

**NOTICE OF OBJECTION TO CLAIM AND DEADLINE TO REQUEST HEARING
DATE**

Michelle Nicole Archie has filed an objection to the proof of claim you filed in this bankruptcy case.

NOTICE: Your claim may be reduced, modified, or eliminated. You should read this notice and the objection carefully and discuss them with your attorney, if you have one.

If you do not want the court to enter an order affecting your claim, then on or before August 12, 2018, (30 days from the date of service), you or your lawyer must file a request for hearing or a written response to the objection explaining your position.

Those not permitted to file electronically must deliver any request for hearing or response by U.S. mail, courier, overnight/express mail, or in person at: (select the appropriate address)

Ronald Reagan Federal Building
228 Walnut Street Rm 320
Harrisburg, PA 17101

If you mail your request for hearing or response to the court, you must mail it early enough so the court will receive on or before the date stated above.

You must also send a copy of your request for hearing or response to:

Dorothy L. Mott, Esquire

Mott & Gendron Law

125 State Street

Harrisburg, PA 17101

717. 232.6650 Tel

717.232.0476 Fax

doriemott@aol.com

If you or your attorney do not take these steps, the court may decide that you do not oppose an order affecting your claim. Attorney for Objector

/s/ Dorothy L. Mott

Mott & Gendron Law

PA ID: 43568

125 State Street, Harrisburg PA 17101

717. 232.6650 Tel

717.232.0476 Fax

doriemott@aol.com

Date of Notice: July 13, 2018

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Respondent/Claimant		

I, the undersigned, hereby certify that on July 13, 2018, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036 dehartstaff@pamd13trustee.com	Electronically
SPECIALIZED LOAN SERVICING LLC ATT MARY D VITARTAS BONIAL & ASSOCIATES PC 14841 DALLAS PARKWAY SUITE 425 DALLAS, TX 75254	First Class Mail, Postage Prepaid

/s/Dorothy L Mott

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ORDER

UPON CONSIDERATION of the Objection to Proof of Claim filed by the Debtor, it is
hereby

ORDERED that the Postpetition claim of the Respondent is disallowed and dismissed